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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

ANDREW G. CLARK,

Plaintiff Pro Se,

v.

WELLS FARGO BANK, N.A., et al.
Defendants.

Case No. 6:20-cv-253-AA

DEFENDANT WELLS FARGO BANK,
N.A.'s SUPPLEMENTAL
MEMORANDUM OF POINTS AND
AUTHORITIES IN SUPPORT OF EX
PARTE REQUEST FOR AN ORDER TO
SHOW CAUSE RE: SANCTIONS
AGAINST PLAINTIFF FOR VIOLATING
THE COURT'S MAY 8, 2020 ORDER

Since May 15, 2020, when defendant Wells Fargo filed a Motion for Order to Show Cause regarding why Plaintiff should not be sanctioned for violating the Court's May 8 Order prohibiting Plaintiff from contacting or communicating with Wells Fargo or any affiliated persons or entities unless authorized by the Court, Plaintiff continues to willfully violate this Court's Order in blatant disregard for this Court's authority.

On May 27, 2020, Plaintiff once again made unauthorized contact with Wells Fargo's Board of Directors in a correspondence in which he alleges that the June 2 oral argument hearing that the Court set on May 20 (Docket #91) "is a fraud and a setup," that he was "working on formal bar complaints against anyone with out of state licenses," and that "[n]o matter what...I just keep going." (Supplemental Declaration of Christian J. Rowley ("Suppl. Rowley Decl. ¶ 10, Ex. A). The next day, Plaintiff violates the Order again by contacting one of Wells Fargo's branches by faxing the branch a document entitled "EMERGENCY: DOCKET FRAUD LEADING TO 6-2-20 'KILL ANDY HEARING' How to Detect Case Specific Docket Fraud - Attached FBI Emergency Crime Report," and an email between what appears to be Plaintiff and the Eugene Police Department or the Federal Bureau of Investigation in which Plaintiff reported the alleged "fraud" as "criminal activity." (Suppl. Rowley Decl. ¶ 11, Ex. B).

As set forth more fully in Wells Fargo's prior submissions¹, Plaintiff should be sanctioned and declared as a vexatious litigant.

¹ See Docket # 42, 43, 44, 45, 86, 87, 88.

DATED May 29, 2020

s/ Christian J. Rowley

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